

# **Exhibit 15**

**Seguin, Paula**

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**From:** Slachetka, Meg <MSlachetka@lowenstein.com>  
**Sent:** Tuesday, June 2, 2020 10:24 PM  
**To:** 'Dan Chiorean'  
**Cc:** Blad, Leiv; 'dlitvin@garwingerstein.com'; 'rvandermeulen@labaton.com'; 'delman@gelaw.com'; Chris Letter; 'ktucker@gelaw.com'; 'ccoslett@bm.net'; Andrew Curley; Amanda Hass; Lauren C. Ravkind (lcr@kennynachwalter.com); Jaramillo, Zarema RE: In re Novartis and Par Antitrust Litig. (Exforge) - Subpoena to Lupin Limited and Lupin Pharmaceuticals, Inc.

Dan -

We were surprised to receive the motion to compel from you on Friday night. We last heard from you/Plaintiffs nearly two months ago, in letters dated April 10, 2020. The first letter, to Lupin, sought production of additional “launch preparation documents.” The second letter, to Novel, which, as you know, is now wholly owned by Lupin, also sought “launch preparation documents,” as well as confirmation that Novel had produced its data concerning “the calculation of net prices paid or volume acquired by direct purchasers of generic Exforge from product launch forward.” That letter further sought confirmation that Novel was unable to provide any further answers to Plaintiffs’ questions concerning Novel data “due to the corporate merger between Lupin and Novel and resulting staff turnover.”

In response, we wrote to you on April 17, noting that Lupin had already produced to Plaintiffs its entire ANDA file for generic Exforge and generic Exforge HCT in response to Plaintiffs’ request for launch preparation documents, and that “following a reasonable search, Lupin has located no other non-privileged [launch preparation] documents.” We accordingly confirmed that both Lupin and Novel had complied with Plaintiffs’ subpoenas. We then did not hear from you until you moved to compel on May 29.

Far from being limited to “launch preparation documents” and Novel data, the Motion to Compel seeks production of documents relating to nine sweepingly broad categories of information, including process validation reports, process validation batch manufacturing records, finished product inventory, launch timelines, supply of API, other excipients, and packaging, internal correspondence concerning launch, manufacturing equipment purchases, and any manufacturing difficulties. None of these categories were even mentioned in Plaintiffs’ April 10 letter to Lupin.

Nevertheless, in an effort to avoid burdening the Court, we are willing to conduct an additional search, provided that Plaintiffs can identify with specificity which documents they are seeking through this Motion. The nine categories listed in the Motion to Compel are unreasonably broad, but if Plaintiffs identify targeted categories of documents they seek, we are willing to confirm such documents do not exist through a reasonable search. Please provide such specific categories of documents by June 8, 2020.

Best,  
Meg

**Meg Slachetka**  
Counsel  
Lowenstein Sandler LLP

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**From:** Dan Chiorean <dchiorean@odrlaw.com>  
**Sent:** Friday, May 29, 2020 4:17 PM  
**To:** Slachetka, Meg <MSlachetka@lowenstein.com>  
**Cc:** Blad, Leiv <LBlad@lowenstein.com>; Fazli, Ario <AFazli@lowenstein.com>; 'dlitvin@garwingerstein.com' <dlitvin@garwingerstein.com>; 'rvandermeulen@labaton.com' <rvandermeulen@labaton.com>; 'delman@gelaw.com' <delman@gelaw.com>; Chris Letter <cletter@odrlaw.com>; 'ktucker@gelaw.com' <ktucker@gelaw.com>; 'ccoslett@bm.net' <ccoslett@bm.net>; Andrew Curley <ACurley@bm.net>; Amanda Hass <ahass@odrlaw.com>; Lauren C. Ravkind (lcr@kennynachwalter.com) <lcr@kennynachwalter.com>  
**Subject:** In re Novartis and Par Antitrust Litig. (Exforge) - Subpoena to Lupin Limited and Lupin Pharmaceuticals, Inc.

Counsel,  
Attached please find papers that were filed with the Court this afternoon.

Have a nice weekend,  
DC

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